

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NEWPORT NEWS DIVISION**

JAMESINA CRAWFORD, *et al.*, )  
Plaintiffs, ) Case No. 4:14-cv-00130-AWA-RJK  
vs. ) JURY TRIAL DEMANDED  
NEWPORT NEWS INDUSTRIAL )  
CORPORATION, )  
Defendant. ) Judge Arenda Wright Allen

**JOINT MOTION FOR LEAVE TO AMEND SCHEDULING ORDER**

Plaintiffs and Defendant Newport News Industrial Corporation (“Defendant”) (collectively, the “parties”) respectfully move this Court for leave to file an amended scheduling order. In support of their joint motion, the parties state:

1. As the Court has noted previously this is a “complex,” multi-plaintiff employment lawsuit.
2. On September 9, 2015, the Court issued an initial Scheduling Order in this case. Doc. 41. It was subsequently modified on April 13, 2016. Doc. 98.
3. Because of the extensiveness of discovery, motion practice, etc., originally-scheduled trial dates were stricken.
4. Following resolution of numerous motions for summary judgment and other post-discovery motion practice, on January 9, 2020, the Court reset trial in this case for October 14, 2020 at 10 a.m.
5. Due to the complexity of the case and number of remaining plaintiffs, the trial is scheduled for six weeks.

6. To assist in the smooth administration of the trial, the parties have worked cooperatively and agreed to various pre-trial deadlines to govern, for example, supplementation of discovery, exchange of exhibits and deposition designations, etc. The parties' Proposed Amended Scheduling Order is filed with this Motion as **Exhibit 1**.

7. Accordingly, the parties respectfully request the Court grant their motion for leave and amend the scheduling order(s) to adopt the deadlines proposed.

8. Because the parties agree to the relief sought and bring this as a joint motion, no hearing will be requested.

WHEREFORE, for good cause shown, the parties respectfully request the Court grant their Joint Motion for Leave to Amend Scheduling Order, adopt the deadlines proposed, and for such other relief as the Court deems proper.

**RESPECTFULLY SUBMITTED,**

/s/ Sharon Reyes

Burt H. Whitt  
Virginia State Bar No.  
18308  
Patrick H. O'Donnell  
Virginia State Bar No. 29637  
Sharon K. Reyes  
Virginia Bar No. 87701  
KAUFMAN & CANOLES, P.C. 150 West  
Main Street, Suite 2100 P.O. Box 3037  
Norfolk, VA 23510  
Telephone: (757) 624-3300  
Facsimile: (888) 360-9092  
[bhwhitt@kaufcan.com](mailto:bhwhitt@kaufcan.com)  
[phodonnell@kaufcan.com](mailto:phodonnell@kaufcan.com)  
[skreyes@kaufcan.com](mailto:skreyes@kaufcan.com)

Scott W. Kezman  
Virginia State Bar No. 36831  
Counsel for Newport News Industrial  
Corporation  
4101 Washington Ave  
Newport News, VA 23607  
Telephone: (757) 380-7157  
Facsimile: (757) 380-3875  
[Scott.W.Kezman@hii-co.com](mailto:Scott.W.Kezman@hii-co.com)

Donald S. Prophete  
Missouri Bar No. 56058  
Nicole H. Howell  
Missouri Bar No. 56815  
Jill E. Moenius  
Missouri Bar No. 65050  
CONSTANGY, BROOKS, SMITH  
& PROPHETE, LLP  
2600 Grand Blvd., Suite 750  
Kansas City, MO 64118  
Telephone: (816) 472-6400  
Facsimile: (816) 472-6401  
[dprophe@constangy.com](mailto:dprophe@constangy.com)  
[nhowell@constangy.com](mailto:nhowell@constangy.com)  
[jmoenius@constangy.com](mailto:jmoenius@constangy.com)

/s/ James H. Shoemaker, Jr.

James H. Shoemaker, Jr.  
Jason E. Messersmith  
PATTEN, WORNOM, HATTEN &  
DIAMONSTEIN, L.C.  
12350 Jefferson Avenue, Suite 300  
Newport News, VA 23602  
[jshoemaker@phwd.com](mailto:jshoemaker@phwd.com)  
[jmessersmith@phwd.com](mailto:jmessersmith@phwd.com)

Joshua Friedman  
Rebecca Houlding  
Jesse Centrella  
FRIEDMAN AND HOULDING LLP  
1050 Seven Oaks Lane  
Mamaroneck, NY 10543  
(888) 369-1119  
[josh@joshuafriedmanesq.com](mailto:josh@joshuafriedmanesq.com)  
[rebecca@joshuafriedmanesq.com](mailto:rebecca@joshuafriedmanesq.com)  
[jesse@joshuafriedmanesq.com](mailto:jesse@joshuafriedmanesq.com)

**ATTORNEYS FOR PLAINTIFFS**

Robert Ortals, Jr.  
Missouri Bar No. 56540  
CONSTANGY, BROOKS, SMITH  
& PROPHETE, LLP  
7733 Forsyth Blvd., Suite 1325  
St. Louis, MO 63105  
Telephone: (314) 925-7270  
Facsimile: (314) 727-1978  
[rortbals@constangy.com](mailto:rortbals@constangy.com)

Anjanette Cabrera  
New York Bar No. 3941085  
Naveen Kabir  
New York Bar No. 4674511  
CONSTANGY, BROOKS, SMITH  
& PROPHETE, LLP  
101 Avenue of the Americas  
8th and 9th Floors  
New York, NY 10013  
Telephone: (646) 341-6544  
Facsimile: (646) 341-6543  
[acabrera@constangy.com](mailto:acabrera@constangy.com)  
[nkabir@constangy.com](mailto:nkabir@constangy.com)

Steven W. Moore  
Colorado Bar No. 23320  
CONSTANGY, BROOKS, SMITH  
& PROPHETE, LLP  
600 17th Street, Suite 2700S  
Denver, CO 80202  
[smoore@constangy.com](mailto:smoore@constangy.com)

Daniel F. Basnight  
Virginia State Bar No. 42583  
KAUFMAN & CANOLES, P.C.  
One City Center  
11815 Fountain Way, Suite 400  
Newport News, VA 23606  
Telephone: (757) 873-6300  
Facsimile: (757) 873-6359  
[dbasnight@kaufcan.com](mailto:dbasnight@kaufcan.com)

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of March, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following:

James H. Shoemaker, Jr.  
Jason E. Messersmith  
PATTEN, WORNOM, HATTEN &  
DIAMONSTEIN, L.C.  
12350 Jefferson Avenue, Suite 300  
Newport News, VA 23602  
[jshoemaker@phwd.com](mailto:jshoemaker@phwd.com)  
[jmessersmith@phwd.com](mailto:jmessersmith@phwd.com)

Joshua Friedman  
Rebecca Houlding  
Jesse Centrella  
FRIEDMAN & HOULDING LLP  
1050 Seven Oaks Lane  
Mamaroneck, NY 10543  
[josh@joshuafriedmanesq.com](mailto:josh@joshuafriedmanesq.com)  
[rebecca@joshuafriedmanesq.com](mailto:rebecca@joshuafriedmanesq.com)  
[jesse@joshuafriedmanesq.com](mailto:jesse@joshuafriedmanesq.com)

**ATTORNEYS FOR PLAINTIFFS**

/s/ Sharon Reyes  
Burt H. Whitt  
Virginia State Bar No. 18308  
Patrick H. O'Donnell  
Virginia State Bar No. 29637  
Sharon K. Reyes  
Virginia Bar No. 87701  
KAUFMAN & CANOLES, P.C.  
150 West Main Street, Suite 2100  
P.O. Box 3037  
Norfolk, VA 23510  
Telephone: (757) 624-3300  
Facsimile: (888) 360-9092  
[bhwhitt@kaufcan.com](mailto:bhwhitt@kaufcan.com)  
[phodonnell@kaufcan.com](mailto:phodonnell@kaufcan.com)  
[skreyes@kaufcan.com](mailto:skreyes@kaufcan.com)

**ATTORNEYS FOR DEFENDANT**